

COLORADO DISCHARGE PERMIT SYSTEM (CDPS)
RATIONALE FOR MODIFICATION
SHELL FRONTIER OIL AND GAS CORRAL GULCH WWTF
CDPS PERMIT NUMBER CO- CO0048859, RIO BLANCO COUNTY

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I. TYPE OF PERMIT Modification with Public Notice, 2nd Modification

II. FACILITY INFORMATION

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| A. Facility Type: | Domestic- Minor Municipal, Mechanical System |
| B. Facility Classification: | Class B per Section 100.5.2 of the Regulations for Certification of Water |
| C. Fee Category: | Domestic Wastewater – Mechanical Plant, Category 21, Subcategory 2 |
| Category Flow Range: | Sewage from 20,000 up to 49,999 gpd |
| D. Facility Location: | SE 1/4 of the NW 1/4 of Section 35, T1S, R99W
Latitude 39°55'17" N Longitude 108°28'39" W |
| E. Discharge Points: | Outfall 001A, following ultraviolet (UV) disinfection and prior to entering the polishing pond, when the UV system is in operation.

Outfall 001B, following chlorination and dechlorination and prior to mixing with Corral Creek, when the UV system is not in operation. |

III. PURPOSE OF MODIFICATION

- 1) Shell requests that the compliance date for installation of the temperature probe be modified to September 28, 2012, due to a delay in the start date of field activities.
- 2) Shell requests that the last sentence “Simultaneous discharge from Outfall 001A and 001B are prohibited” be removed from the permit, as there is only one physical outfall from the facility, and the second point of compliance, 001B, is only the point of compliance when the UV system is being cleaned or repaired. Both outfalls are located immediately downstream of the end of the treatment process, and both are located in Corral Gulch.

- 3) Shell requests that the Mixing Zone requirements be removed from the permit. Shell has submitted data from the USGS Station 09306240, located 1,600 feet downstream of the WWTF. Shell confirms that conditions at this gauge site are equivalent to conditions at the WWTF. The low flow conditions in the stream are equal to a minimum channel width of 0.9 ft and a minimum stream gauge height of 1.08 ft. Using Appendix I of the Division's Colorado Mixing Zone Implementation Guidance (Exclusion Tables for Application of the Colorado Mixing Zone Regulations for Streams), Shell believes this facility is exempt from requiring further mixing zone analysis.

IV. CHANGES MADE AS A RESULT OF THE MODIFICATION

- 1) No changes will be made to the compliance date for installation of the temperature probe, as the completion date for installation occurred prior to the Division receiving the request. Also, the Division has since received notification dated on the 27th of August, 2012, that the temperature equipment was installed and is currently operational.
- 2) The Division recognizes the confusion in "prohibiting" discharge at both outfalls at the same time, given that there is only one location at which the discharge enters the stream, though there are two sampling points, the use of which varies depending on whether or not the UV system is in operation. Therefore, the Division is removing the second sampling point, leaving the facility with just a compliance/sampling point at Outfall 001A. Sampling for TRC at this location will be limited to periods of time when the UV system is not in operation and chlorine is used in the treatment process. This change has been made in Section I.A.1 and I.A.2.
- 3) Using the data provided by Shell from the USGS gauge station, the Division has determined that this facility does not require any further mixing zone studies. The mixing zone analysis compliance schedule requirements have been removed from Section I.B.5 of the permit.

Alexander Stafford
October 3, 2012